

105 Kimberly Lane
Kings Mountain, NC 28086
February 7, 1994

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OFFICE OF THE SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

Dear Mr. Secretary:

I have enclosed comments relating to PR Docket 93-305, Vanity Call Signs in the Amateur Radio Service. Please find the original copy for your review, plus a copy for each of the 9 Commissioners.

Thank you for your consideration of my comments.

Sincerely,

Joey A. Ferguson
Joey A. Ferguson, KF4R

/jaf/enclosure

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Dear Mr. Secretary:

I wish to file with the Commission the following comments relating to vanity call signs in the Amateur Radio Service. These comments are offered as a result of the Notice of Proposed Rule Making, PR Docket 93-305, adopted December 13, 1993 and released December 29, 1993 by the Commission.

Having been an amateur radio operator for nearly 20 years, I applaud the Commission's effort in establishing a system capable of performing this service for the amateur radio operators of this country.

I wish to offer comments as they relate to four specific areas:

1. Cost of the system.....
2. Rules for call sign assignment.....
3. Updating the call sign database.....
4. Electronic transfer of data.....

Cost..... The system should strive to pay for itself. Individuals requesting this service should expect to pay break-even expenses incurred by the Commission during this process. The proposed amount of \$70 should constitute satisfactory compensation for this service. The Commission should establish a minimum fee (~\$10 maybe?) for "trying" to accommodate the applicant. However, if no new call is assigned to the applicant, the Commission should be prepared to refund a major portion of the \$70 fee.

Rules for call sign assignment..... The incentive call sign system instituted by the Commission years ago has worked very well. The majority of amateurs have greatly enjoyed having a group of call signs depicting their license class. Judging by the success of the current system, there seems to be no justification in deviating from this tack when considering vanity call sign assignments.

Rules for call sign assignment (continued)... In the amateur radio service, the Amateur Extra class licensee has demonstrated above average knowledge, skill, and desire by virtue of his passing the required written examination elements and the 20 word per minute Morse code requirement. Recognizing this achievement, the Commission should reserve **ALL** unassigned 1x2 call signs, beginning with W, K, and N, in all ten call areas, for the Extra Class licensee **exclusively**. Due to the limited number of 1x2 call signs available, the Commission should consider only those vanity call sign applicants which have held an Extra Class license for **ten or more years**. In addition, the Extra Class licensee should be able to request **ANY** of the other unassigned call signs available within the vanity system, whether it is a 2x1, 1x3, 2x2, or 2x3.

The Advanced Class licensee should have access to a 2x2 or a 1x3 call sign beginning with a W, K, or N prefix letter. This licensee should also be able to choose from any available 2x3 call sign.

The General Class and Technical Plus Class licensee should have available to them any unassigned 1x3 beginning with the N prefix letter. Due to the limited number of 1x3 call signs beginning with W or K, the General and Technician Class operator should **not** be given the opportunity at 1x3 calls beginning with the W or the K. However, this licensee should be able to choose from any unassigned 2x3 call sign.

The Novice Class and the Codeless Technician should not be allowed to participate in the vanity call system in order to keep alive their incentive to upgrade beyond their current level of expertise. As a result, the Commission could continue the incentive licensing program with renewed vigor.

Due to the limited number of unassigned 1x2 and 1x3 call signs, any new club call sign assignments should come from a separate new pool of calls exclusively designated for clubs.


Updating the call sign database..... There are many different modes of data and information exchange available within the Amateur Radio Service. The Commission should consider taking advantage of some of these to help keep the Amateur community informed of recent call sign assignments and other FCC news.

Packet radio, or a simple telephone bbs at FCC headquarters, would provide excellent avenues of time-valued information to amateurs interested in taking advantage of the vanity call sign system. Amateur radio operators could make use of these resources to find out which call signs are currently available and which ones are not.

Options Available for Electronic Transfer of Data Between the Commission and VEC's, Individuals, etc..... Although the Commission does not "currently envision online access" capabilities, there seems to be no escaping such a system. An online system for individual use, and another dedicated for VEC access only, would be the most efficient and reliable method of transferring data to and from the field. VECs and the Commission would especially benefit from such a system. Time, paper handling, and manpower requirements would be greatly reduced. The Commission could issue blocks of call signs and assign them to different VEC groups whereby instant licensing could become a reality. These VEC groups would use the online FCCBBS service to download this type of information and also upload information and data required by the Commission to facilitate day to day business. I believe this system could lessen the burden now imposed on Gettysburg's voice phone lines, not to mention the reduction in general paper handling, mail handling, and the man hours required to service Amateur Radio.

Thank you for your consideration of my comments.

Sincerely,


Joey A. Ferguson, KF4R